

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

In re:

Fraleg Group, Inc.,

Debtor.

Case No. 22-41410-jmm

Chapter 11

**[PROPOSED] ORDER GRANTING CAF BORROWER GS LLC
RELIEF FROM THE AUTOMATIC STAY FOR SETOFF**

Upon the Motion filed by CAF Borrower GS LLC (“**Lender**”) (the “**Motion**”) for an Order, pursuant to 11 U.S.C. §§ 362(d)(1), granting Lender relief from the automatic stay imposed in the above-captioned case for the setoff of certain Reserve Funds as a debt owed by Lender to Debtor, against the indebtedness owed by Debtor to Lender, as further described in the Motion, which setoff results in the CAF Agreed Secured Claim as detailed therein; and due and proper notice of the Motion having been made on all necessary parties; and there being no objection to the Motion; and upon there being no contest to the Motion by Debtor; and Debtor having consented to the requested relief; and upon all the proceedings had before the Court and after due deliberation and sufficient cause appearing; it is hereby:

ORDERED that Lender’s Motion is GRANTED and that, pursuant to 11 U.S.C. § 362(d)(1), the automatic stay is hereby lifted allow Lender to exercise Lender’s rights to setoff; and it is further

ORDERED that Lender may immediately pursue and exercise Lender’s rights to setoff; and it is further

ORDERED that the granting of this Motion does not affect the Agreed CAF Secured Claim as further detailed in the Motion.

